

LAW OFFICES OF
VICTOR A. WORMS
48 Wall Street, SUITE 1100
NEW YORK, NY 10005
TELEPHONE: (212) 374-9590
FACSIMILE: (212) 591-6188

WRITERS EMAIL
VWORMS@VICTORAWORMSPC.COM

December 30, 2024

Hon. Arun Subramanian
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, New York 10007

Re: Citibank, N.A., as Trustee For The Benefit Of
The Holders Of CF-2020 P1 Mortgage Trust
Commercial Mortgage Pass-Through Certificates,
Services 2020 1 v. Hello Flatbush LLC et al
Docket No. 23-cv-10920 (AS)

Dear Judge Subramanian:

I write to consent to the application by counsel for defendant Hello Flatbush, LLC, Mark A. Berman, Esq., to adjourn today's court conference scheduled for 3 PM.

I do empathize with the difficulties that Mr. Berman is having accessing the zip files that were provided to him with fully responsive documents to his various discovery demands on Fink & Zelmanovitz, P.C.

I also encountered similar difficulties accessing the same files that the third-party litigation vendor provided. In actual fact, these difficulties materially contributed to the delays in the production of these documents.

In any event, as I mentioned in one of my email exchanges with Mr. Berman on Saturday, January 28, 2024, my clients' "only interest is to be fully transparent and cooperative" in this matter. To that end, we look forward to the upcoming depositions.

Finally, Mr. Berman requested that today's hearing be adjourned to next Monday, January 6, 2025. Unfortunately, I am not available on that date. However, I am available the

following Monday if that is convenient for the Court.

Respectfully submitted,


Peter A. Worms

All counsel by ECF